1908-018 Chancery Causes: Lilly Bowman vs Nil Bowman
Lee Co.

Stewart

CA-Divorce
T-Vices

To the Honorable H.A.W.Skeen,Judge of the Circuit Court of Lee County,Virginia:

Humbly complaining,your Complainant ,Lilly Bowman,would respectfully represent and show unto your honor that she is now and has been for more than one year before the institution of this suit a resident of Lee County Virginia,and has been all her life for that matter;that she on the ___day of __ I90__ was married to one Nil Bowman ;that they lived together as husband and wife for a time ,when her said husband became infatuated with another woman,and committed acts of adultery with her. Your Complainant alleges that said acts of adultery were committed without her procurement or connivance; that they were committed within five years before the institution of this suit;that she has not lived with,nor cohabited with the said Nil Bowman,since she had knowledge of his said acts of adultery;that they last cohabited together in this County and State.Your complainant alleges that she is entitled to a divorce from her said husband the said Nil Bowman.

She therefore prays that the said Nil Bowman be made a party defendant to this bill and answer the same but not on oath ,that being waived ;that the bonds of matrimony now existing between Complainant and defendant be dissolved, and your complainant be divorced a vinculo Matrimonii'; and that your honor grant all other and further relief generally,that the nature of her case may require or to equity seem meet and your complainant will ever pray &c.

M. G. Ely — P.Q.

Costs:
Clerk $3.55 pd.
Pax 1.50 pd
atty. 15.00
Shff. 1.00 pd.
Depo. 1.25 pd.
$22.30
S

Ely

Lilly Bowman

Vs. } Bill in chancery

Wil-Bowman

1908 2nd Oct. Rules
Bill filed. Spa.
Issued.
" 1st Nov. Rules
cause def for
hearing.

Lilly Bowman Pltff -
against Ex Parte Chancery -
Nil - Bowman. Dfdt.

This cause come on this day to be heard upon the bill of complainant & depositions filed therewith, and was argued by counsel for Plaintiff -

Our consideration of which, proces having been duly served on the defendant and he failing to plead, answer & demur, the bill is taken for confessed and the court being of opinion, that the allegations of Plaintiffs bill has been proven, it is adjudged, ordered and decreed, that the bonds of matrimony now existing between plaintiff and defendant be dissolved, and the plaintiff be forever divorced a vinculo matrimonii, and the court further decrees that the said Nil Bowman be enjoined and restrained from again marrying until further order of the Court, and the court doth decree that the Plaintiff recover of the defendant her costs of this suit to be taxed by clerk for which execution may issue, and nothing further remains to be done the cause is stricken from the docket,

Lilly Bowman
vs
EE Dicree
Wil Bowman

Entered in C.O.B.
#8, page 420 &c.

Enter This

H A W Sheen

Dec 11-1908

The deposition of A.P.Stewart, taken before me, Geo.P.Cridlin, a commissioner in Chancery for the Circuit Court of Lee County, Virginia, on the 10th day of December, 1908, at the office of M.G.Ely, in the Town of Jonesville, Va.pursuant to notice hereto attached, which deposition is intended to be read as evidence in behalf of the plaintiff in a certain suit in chancery now pending in the Circuit Court of Lee County in which Lilly Bowman is plaintiff and Nil Bowman is defendant.

Present: M.G.Ely attorney for plaintiff.

A.P.Stewart, a witness of lawful age being duly sworn deposes as follows:

Q.1.-- State your age, residence and occupation and whether or not you know the parties to this suit.

A.-- I am 28 years old, live near Jonesville, occupation farming. I am acquainted with Nil Bowman, know him better than I know Lilly Bowman.

Q.2.-- Please state if you know whether or not they are now living together and where does the plaintiff now live, and if in this County how long has she been living in this County.

A.-- They are not now living together. She lived near Pennington Gap in this County when I last saw her. I am informed that she now lives near Hubbard Springs in this County.

Q.3.-- Please state if you know whether or not the defendant was ever married before he married the plaintiff in this cause.

A.-- He was married, and got a divorce from his previous wife before he married the plaintiff.

Q.4.-- State whether or not the defendant Nil Bowman left the plaintiff in this suit and has lived in adultery with another woman.

A.-- I know that he left his present wife, and that he has been staying some with his former wife as husband and wife, without being married or getting a divorce, and his leaving his ~~2ndxx~~ wife and going back to live with his former wife in adultery, I believe to be without her procurement or connivance. This has all taken place within the last 12 months. The plaintiff and defendant last co-habited together in this County.

And further this deponent saith not.

A. P. Stewart

Virginia, Lee County, to-wit:

I, Geo.P.Cridlin, a commissoner in Chancery for the Circuit Court of Lee County, hereby certify that the foregoing deposition of A.P.Stewart was taken, sworn to and subscribed before me at the time place and for the purpose in the caption mentioned. Given under my hand this Dec. 10th,1908.

Geo P Cridlin Comm in Chy

Lilly Bowman
vs { Depos.
Nil Bowman

Filed Dec. 10, 1908

H. E. Ewing, Clerk

deftns 150
N.P. 25
$1.25 P.

22-30
5
17.30
9
$8.30

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Form No. 404.

To Nil Bowman—

Take notice that I shall, on the 10th day of December 190 8
at M. G. Ellys Law office in Jonesville, Va.
between the hours of 6 A. M. and 6 P. M., on that day, proceed to take the depositions
of A. P. Stewart and others, to be read in evidence in my behalf,
in a certain Suit depending in the Circuit court for the County
of Lee wherein you are Defendant,
and Jane Plaintiff

and if from any cause, the taking of the said depositions be not commenced on that day, or if commenced, be not concluded on that day, the taking of the same will be adjourned and continued from day to day, or from time to time, at the same place and between the same hours, until the same shall be completed. Very respectfully,

Lilly Bowman.
By Counsel—

FORM NO. 404.

Lilly Bowman.

vs. } NOTICE TO TAKE DEPOSITIONS.

Nil Bowman.

Wm. G. Ely. p. q.

Executed by delivering a true copy of the within notice to Nil Bowman this Dec-9th 1908-

France Miles D.D.
for W.Y. Tucker
S.J.C.

The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

WE COMMAND YOU, That you summon Nil Bowman

to appear at the Clerk's office of the Circuit Court of the County of Lee, at rules to be held for the said court, on the 3rd Monday in October 1908, to answer a bill in chancery exhibited against him in our said Court by Lilly Bowman

And have then there this writ. Witness, H. C. T. EWING, Clerk of our said Court, at the court-house, the 28 day of Sept., 1908, and 133 year of the Commonwealth.

A Copy, Teste:

H. C. T. Ewing, Clerk

, Clerk

Lilly Bowman

VS { SUBPŒNA IN CHANCERY

Nil Bowman

M. G. Ely p. q.

To 2nd Oct Rules

Lee Circuit Court

1908.

Executed by leaving a
true copy of the with in
Summon on Nil
Bowman this the 3 day
of Oct-1908

M A Penny
D Sheriff for
W. G. Tucker S. L. C.